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Attorneys for Plaintiff Forest Ambulatory  
Surgical Associates, L.P. doing business as Forest  
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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

FOREST AMBULATORY SURGICAL  
ASSOCIATES, L.P., doing business as  
FOREST SURGERY CENTER,

Plaintiff,

vs.

UNITED HEALTHCARE INSURANCE  
COMPANY and DOES 1 through 20,

Defendants.

CASE NO. CV10-04911 EJD  
(Case Assigned for All Purpose to Hon.  
Edward J. Davila)

**JOINT STIPULATION AND ~~PROPOSED~~**  
**ORDER EXTENDING TIME TO FILE**  
**SECOND AMENDED COMPLAINT**

(Santa Clara Superior Court Number:  
110CV183843)

Complaint Filed: Sept. 29, 2010

Plaintiff, FOREST AMBULATORY SURGICAL ASSOCIATES ("Forest") and  
Defendant, UNITED HEALTHCARE INSURANCE COMPANY ("United"), hereby agree to  
extend the deadline to file the Second Amended Complaint based on the following reasons:

- (1) Forest has requested from United, but not yet received, all of the ERISA  
plan documents and summary plan descriptions for the claims at issue in  
this case. The parties anticipate that three additional weeks will provide

1 sufficient time for United to provide the plan documents and for Forest to  
 2 review and incorporate relevant plan terms as appropriate in its amended  
 3 pleading.

4 (2) Forest has recently become aware of additional unpaid and/or underpaid  
 5 claims that may be appropriate to add to this lawsuit. Being granted three  
 6 weeks of additional time to evaluate the potential new claims would enable  
 7 Forest to file a more complete Second Amended Complaint.

8 **IT IS SO STIPULATED.**

9  
 10 DATED: July 29, 2011

HOOPER, LUNDY & BOOKMAN, P.C.

11  
 12 By: 

KATHERINE R. MILLER

13 Attorneys for Plaintiff Forest Ambulatory Surgical  
 14 Associates, L.P. doing business as Forest Surgery  
 Center

15 DATED: July 29, 2011

WALRAVEN & LEHMAN LLP

16  
 17 By: 

BRYAN S. WESTERFELD

18 Attorneys for Defendant United Healthcare Insurance  
 19 Company


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~~FILED~~  
~~[PROPOSED]~~ ORDER

IT IS HEREBY ORDERED that, good cause having been shown, Forest Ambulatory Surgical Center's deadline to file its Second Amended Complaint is extended from August 12, 2011 to September 2, 2011.

**IT IS SO ORDERED.**

DATED: August 2, 2011

By:   
Honorable Edward J. Davila  
United States District Court Judge

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